

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1 AND JANE DOE 2,

*Plaintiffs,*

v.

ESTATE OF JEFFREY EPSTEIN;  
SUE ROE; and ROES 2-10,

*Defendants.*

Case No. 1:19-cv-07675-GBD-DCF

**JOINT STIPULATION FOR  
ORDER ON PLAINTIFFS' ANONYMITY**

Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (named herein as "Estate of Jeffrey Epstein") (together, "Defendants"), jointly with Plaintiffs Jane Doe 1 and Jane Doe 2 (together, "Plaintiffs"), through undersigned counsel for Defendants, respectfully submit this stipulation (the "Stipulation") together with the attached proposed Order on Plaintiffs' Motion For Leave to Proceed Anonymously (ECF #4).

The parties respectfully request the Court enter the attached proposed Order which would supersede the Court's prior Order Granting Plaintiffs' *Ex Parte* Motion For Leave to Proceed Anonymously (ECF# 9).

Dated: December 5, 2019  
New York, New York

Respectfully submitted,

TROUTMAN SANDERS LLP

By: /s/ Bennet J. Moskowitz

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Richard D. Kahn, Co-Executors of the Estate  
of Jeffrey E. Epstein*

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**ORDER ON PLAINTIFFS' ANONYMITY**

IT IS HEREBY ORDERED that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiffs shall disclose Plaintiffs' identities to Counsel of Record for Defendants, in writing.
2. Counsel of Record for Defendants may disclose a Plaintiff's identity only to Defendants and any attorneys, paralegals, and clerical or other assistants working with or for Defendants on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If Defendants wish to disclose a Plaintiff's identity to any person not otherwise permitted to receive such information under this Order, Defendants are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing the Plaintiff's identity to any other persons. Defendants must maintain a list of all such persons to whom a Plaintiff's identity is disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose a Plaintiff's identity shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. The parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal shall also publicly file a redacted copy of the same, via the Court's Electronic Case Filing system, that redacts the Plaintiff's identity and text that would reveal the Plaintiff's identity.
5. The parties may seek to modify or amend this Order at any time upon motion to the Court or by stipulation.

SO ORDERED.

Date: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
HON. DEBRA FREEMAN  
United States Magistrate Judge

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**NON-DISCLOSURE AGREEMENT**

I, \_\_\_\_\_, acknowledge that I understand that the identities of the Plaintiffs in this action are confidential. I agree that: (1) I will hold in confidence all Plaintiffs' identities; (2) I will use Plaintiffs' identities only in connection with this litigation; and (3) I will take all due precautions to prevent the unauthorized or inadvertent disclosure of Plaintiffs' identities.

By acknowledging these obligations under this Non-Disclosure Agreement, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunder, and that my willful violation of any term of the Non-Disclosure Agreement could subject me to punishment for contempt of court.

Dated:

\_\_\_\_\_  
[Signature]